

CWA Notice of Violations (NOVs)

Date: 3/16/2015

ROUTING AND TRANSMITTAL SLIP

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1.	Elliott/Ammons	KE	3/17/2015
2.	Mattox (Tracking)	MM	3/19/15
3.	White/Horsey	A	3/23/15
4.	Bush	BB	3/23/15
5.	Ghosh	GH	3/23/15
6.	Ellis/Diaz	ED	4/8/15
7.	Marcus/Giattina	MG	4/8/15
8.	White (Mailing/e-filing) / Mattox (Copy)		
9.	Elliott		

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Coordination	Justify	

From: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Richard Elliott, Municipal & Industrial Enforcement Section/Water Protection Division	Phone No. 2-8691

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions.

REMARKS: Inspection report and NOV for the Town of Andrews, SC

Electronic Version Saved on: T:\NPEB\Collection Systems\Enf-Comp\SC\Town of Andrews, SC\Andrews Inspection Report NOV 3-13-2015

Contacted State Agency: Y/N

Date: 3/23/15

Who at State: Glen Trotter
Vicki Lewis

Route in green folder

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 09 2015

CERTIFIED MAIL 7010 1060 0002 1703 8143
RETURN RECEIPT REQUESTED

Town of Andrews
Attn: The Honorable Rodney Giles
Mayor, Town of Andrews
905 West Pine Street
Andrews, South Carolina 29510

Re: Notice of Violation
Town of Andrews
National Pollutant Discharge Elimination System Permit No.: None
U.S. Environmental Protection Agency and South Carolina Department of Health
& Environmental Control Compliance Evaluation Inspection

Dear Mayor Giles:

On August 26, 2014, the United States Environmental Protection Agency Region 4 and the South Carolina Department of Health and Environmental Control (DHEC) conducted a Compliance Evaluation Inspection (CEI) of the Wastewater Collection and Transmission System (WCTS) in the Town of Andrews (Town). The objective of this CEI was to assess the Town's compliance with the Clean Water Act (CWA). Additionally, the EPA evaluated the Town's Management, Operations and Maintenance (MOM) programs related to its WCTS. The inspection results are summarized in the enclosed CEI report.

As a result of the information gathered pursuant to the CEI, the EPA has determined that the Town is in violation of the CWA as follows:

The Town has not reported Sanitary Sewer Overflows (SSOs) to the regulatory authority on numerous occasions. Several Pump Stations owned and operated by the Town are in disrepair and result in untreated sewage being discharged from the WCTS to navigable waters of the United States as defined by Section 502 of the CWA, 33 U.S.C. § 1362. Such SSOs were not authorized by a National Pollutant Discharge Elimination System permit and are therefore violations of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

The EPA has decided not to initiate an enforcement action at this time. However, the Town's full compliance with the current Administrative Order from DHEC (order #: 14-048-W), future progress in developing and implementing written MOM programs, rehabilitation of the WCTS and progress towards eliminating SSOs will determine if future EPA enforcement actions are warranted. The EPA will monitor the Town's progress in developing and implementing MOM programs and WCTS rehabilitation over the next two years.

Until compliance with the CWA is achieved, the Town is considered to be in violation of the CWA and subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

If you have any questions regarding this Notice of Violation, please contact Mr. Richard Elliott, of my staff, at (404) 562-8691 or via email at elliott.richard@epa.gov. You may address written correspondence to Mr. Elliott at the above address on the letterhead.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Giattina', is written over the printed name.

James D. Giattina
Director
Water Protection Division

Enclosure

cc: Mr. Glenn Trofatter
South Carolina Department of Health and Environmental Control

Ms. Mauretta W. Dorsey
Town of Andrews

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

**Water Protection Division
Clean Water Enforcement Branch**



COMPLIANCE EVALUATION INSPECTION REPORT

**Town of Andrews Water Department
Georgetown & Williamsburg Counties
South Carolina**

NPDES Permit No. None (Satellite to City of Georgetown)

Facility Address:

**P.O. Box 378
101 North Morgan Avenue
Andrews, South Carolina 29510**

Inspection Dates:

August 26, 2014

Inspectors:

**Richard Elliott, Enforcement Officer, EPA Region 4
Shauna Stevens, Wastewater Inspector, DHEC
Sean Torrens, Environmental Manager DHEC**

Inspection Report Prepared by:

Richard Elliott, P.E.

October 26, 2014

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ABBREVIATIONS AND ACRONYMS

CEI	Compliance Enforcement Inspection
CMOM	Capacity, Management, Operation, and Maintenance
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	United States Environmental Protection Agency
FOG	Fats Oils and Grease
GIS	Geographic Information System
GPM	Gallons per Minute
I/I	Infiltration and Inflow
ICIS	Integrated Compliance Information System
MGD	Million Gallons per Day
MOM	Management, Operation, and Maintenance
NPDES	National Pollutant Discharge Elimination System
POTW	Publicly Owned Treatment Works
PS	Pump Station
RDII	Rain Derived Infiltration and Inflow
SORP	Sewer Overflow Response Plan
SSES	Sanitary Sewer Evaluation Survey
SSO	Sanitary Sewer Overflow
STP	Sewer Treatment Plant
DHEC	South Carolina Department of Health & Environmental Control
WCTS	Collection and Transmission System
WWTP	Wastewater Treatment Plant

I. OVERVIEW

The Town of Andrews' (the Town) Water & Wastewater Department provides drinking water and sanitary sewer services to approximately 1,000 residential customers in the Town of Andrews, South Carolina. The Town does not own or operate a Wastewater Treatment Plants (WWTP). It is a satellite system that is served by the regional plant located in the City of Georgetown. The estimated combined population served is 2,900 with an approximately service area of 2.2 square miles. The City is responsible for 24 Pump Stations (PS) and shares ownership of a large force main with Georgetown County Water and Sewer District (GCWSD). This force main is used to convey flows from both the Town and GCWSD to the regional WWTP.

The EPA conducted a Compliance Evaluation Inspection (CEI) of the City's Wastewater Collection and Transmission System (WCTS) on August 26, 2014. The purpose of this CEI was to evaluate compliance with the Clean Water Act (CWA) as it relates to Sanitary Sewer Overflows (SSOs) from the sewer system and to assess the City's MOM programs. Additionally, this compliance inspection was intended to examine the causes and potential corrective actions for SSOs from the WCTS.

During the inspection, the EPA requested written documentation of any MOM programs that the City may use to operate and maintain its WCTS. The EPA also discussed inspection and maintenance records, interviewed management personnel and visited various sites in the WCTS, including Airport PS, PS numbers 5, 7, 11, 19 and 23 as well as the inspecting several man holes on Elmwood Street. This report describes EPA's findings, identifies areas that need to be addressed and presents preliminary recommendations.

II. OBJECTIVES

The specific objectives of the inspection were to assess City's compliance with the CWA, evaluate reported SSOs, assess the MOM programs, where implemented, and to examine the causes of SSOs in the sewer system. Additionally, this inspection was intended to assess the impacts if any, that the Town's wastewater flow has on the City of Georgetown's WCTS and Wastewater Treatment Plant. All the wastewater from the Town of Andrews is conveyed to the City of Georgetown's regional WWTP for treatment.

III. INVESTIGATION METHODS

The investigation included:

- Review of the Integrated Compliance Information System - National Pollutant Discharge Elimination System (ICIS-NPDES) federal database, state documents and the NPDES Permit if any;
- Review Town's proposed SSO corrective projects if any;
- Interviews with the Town's Wastewater Division personnel; and,
- Visual inspection.

IV. REGULATORY SUMMARY

The South Carolina Department of Health & Environmental Control (DHEC) is authorized under the CWA to implement the NPDES program in the State of South Carolina. As a part of this implementation, DHEC provides oversight of the efficacy of operation and maintenance of the WCTS associated with all NPDES permits. The Town of Andrews has a Satellite Sewer System permit (NO. SSS000688) to discharge into the regional WWTP operated by the City of Georgetown. The City of Georgetown is authorized by DHEC under NPDES permit No. SC0040029 to discharge treated effluent into the Sampit River.

SSOs that impact waters of the U.S. are prohibited based on Sections 301 and 402 of the CWA which generally prohibits the discharge of pollutants by any person unless authorized by an NPDES permit. Part II Section E.1 of the regional WWTP's NPDES permit, states that the permittee shall at all times properly operate and maintain in good working order and operate as efficiently as possible all facilities and systems of treatment and control and related appurtenances which are installed or used by the permittee to achieve compliance. The WCTS is included in the "related appurtenances" that the NPDES permit mentions. Further, Part II Section E.6.c. (2) stipulates that the permittee must provide adequate capacity to convey base flows and peak flows for all parts of the sewer system. Any release from the sewer system is therefore a violation of this section of the permit. The WWTP operator and permittee does not have the authority over the WCTS in the Town of Andrews.

V. INSPECTION SUMMARY AND FINDINGS

The EPA performed a pre-inspection evaluation and an on-site inspection of the WCTS. The pre-inspection evaluation of the Town's WCTS consisted of examining historic records submitted by the facility to DHEC and the EPA by the regional WWTP. This section will provide a summary of both means of evaluation as well as any recommendations to the facility to improve the WCTS performance.

A. Analysis of SSOs

Discharges to waters of the United States from sanitary sewer systems are prohibited unless authorized by an NPDES permit. In addition, overflows from the sewer system that do not reach waters of the United States can be indicative of a failure to comply with the proper operation and maintenance provisions of Part II Section E.6.c. of the NPDES permit.

The City of Georgetown owns and operates a regional WWTP that treats all the wastewater produced in the City, the Town of Andrews and a portion of the wastewater generated in GCWSD. A close look at the SSO data submitted to DHEC by both GCWSD and the City of Georgetown, revealed discrepancies in the number and volume of the SSOs reported. Further investigation by the EPA revealed that these discrepancies were as a result of reporting and recording errors. At the time of this inspection, the Town of Andrews was not reporting SSOs to DHEC. Very little WCTS documentation is done by the operators of the WCTS in the Town. The Town could not produce any records or logs for the operation of the system. A staff of three people serviced both the water and wastewater departments. Town

representatives indicated that SSOs typically accompany rain events and that the last SSO noticed was about two weeks prior to this inspection.

B. Management Interview

The EPA met with representatives of the Town on August 26th, 2014, at City Hall. Topics of discussion during the meeting included the use and documentation of any MOM programs including Fats, Oil, and Grease (FOG) Control, Root Control, Capacity Assurance, Preventive Maintenance and Inspections, Emergency Response, Pump Station Back-up Power, reporting procedures and the existing operating relationship between GCWSD, the Town of Andrews and the City of Georgetown. The EPA discussed concerns about the lack of recording and reporting of SSOs with the representatives and inquired about each program listed above to determine whether a formal or non-formal (not in writing) program existed to manage various maintenance and operations needs of the WCTS.

A review of previous inspection reports conducted by DHEC inspectors combined with this CEI, forms the basis for the recommendations and conclusion outlined in this report. In general, City has no written operating procedures for any of the MOM programs that the EPA recommends.

C. Site Inspection

The EPA performed an on-site inspection of various points in the WCTS. A SSO history does not exist for the Town since they do not report SSOs. The EPA inspected several manholes and pump stations as well as operational equipment available (backup generators and emergency pumps). Approximately 50% of the pump stations do not have the minimum required number of pumps. A number of pump stations needed repairs.



Figure 1: PS #19 Soil erosion around the PS due to SSO (Left) arrow; PS #19 Wet well destroyed by wastewater during wet weather SSO (Right).



Figure 2: PS #19 Wet well slab broken and partially submerged (Left); PS #19 almost at the point of overflowing, pump failed to start (Right).

VI. Recommendations and Conclusion

A. Recommendations

The EPA recommends that the Town develop the full suite of MOM programs outlined in the guidance document provided as an attachment to this report. Given the Town's small size and limited income, the EPA recommends that additional discussions between the EPA, DHEC and the Town be used to assist the Town in prioritizing MOM programs and to improve operational procedures.

MOM program development guidance documents can be found on EPA, Region 4's website at <http://www.epa.gov/region4/water/wpeb/momproject/>.

B. Conclusion

The Town water and wastewater department appeared under staffed and under trained. Several deficiencies were noted during the inspection. Deficiencies were noted related to infrastructural improvements, inadequate equipment as well as operational improvements.

